# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA NEW ALBANY DIVISION

SHON COOPER AND JACKIE	§
READ, ON BEHALF OF	§
THEMSELVES AND ALL OTHERS	§
SIMILARLY SITUATED,	§
	§
PLAINTIFFS	§
	§
V.	<b>§</b> 4:23-cv-140-SEB-KMB
	<b>§</b>
INTACT PROFESSIONAL HEALTH	§
& SAFETY SERVICES, INC.,	<b>§</b>
	§ JURY TRIAL DEMANDED
DEFENDANT	<b>§</b>

## JOINT STATUS REPORT

- 1. At the time of the filing of this report, there are a total of 18 individuals who have appeared as Plaintiffs herein (2 named Plaintiffs and 16 opt-in Plaintiffs). If any additional consent forms are timely received by Plaintiffs' counsel, they will promptly file them with the court.
  - 2. At this time, the Parties plan to pursue settlement of the case.
- 3. On or before January 10, 2025, Defendant will produce all time and pay records for all Plaintiffs for the period three (3) years before their appearance in this lawsuit or May 1, 2021, whichever is earlier.
- 4. On or before January 24, 2025, Plaintiffs will send a settlement demand for all Plaintiffs to Defendant.
- 5. On or before January 31, 2025, Defendant will respond to Plaintiffs' settlement demand.
- 6. On February 28, 2025, the Parties will participate in a mediation of all claims asserted in this case with Frank Neuner in St. Louis, Missouri.

7. No later than March7, 2025, the Parties will report to the Court whether the mediation was successful. If the mediation is successful, the Parties will give the Court a timeframe for concluding the litigation; if the mediation is unsuccessful, the Parties will submit a proposed scheduling order for the remainder of the litigation.

Respectfully Submitted,

### WELMAKER LAW, PLLC

409 N. Fredonia, Suite 118 Longview, Texas 75601 Tel: (512) 799-2048

By: /s/ Douglas B. Welmaker

Douglas B. Welmaker

Texas State Bar No. 00788641

doug@welmakerlaw.com

#### ATTORNEY-IN CHARGE FOR PLAINTIFF

/s/ Josef F. Buenker
By: Josef F. Buenker
TBA No. 03316860
P.O. Box 10099
Houston, Texas 77206
713-868-3388 Telephone
713-683-9940 Facsimile
jbuenker@buenkerlaw.com
ATTORNEY FOR PLAINTIFF

#### ATTORNET FORTEAUTHT

/s/ Courtney M. Witten

Courtney M. Witten BakerHostetler, LLP 1801 California Street, Suite 4400 Denver, Co 80202 Telephone: (303)764-4058

Email: cwitten@bakerlaw.com
ATTORNEY FOR DEFENDANT

# **CERTIFICATE OF SERVICE**

I certify that on December 16, 2024, I filed on behalf of the Parties jointly the foregoing document with the Court and served all parties of record via ECF.

/s/ Josef F. Buenker
Josef F. Buenker